

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September
11, 2001

03 MDL 1570 (GBD)(SN)
ECF Case

This document relates to:

***Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN) (and member case *Marie Laure Anaya, et al. v. Islamic Republic of Iran*, 1:18-cv-12341 (GBD) (SN))**

I, JOSEPH PETER DRENNAN, hereby declare, pursuant to 28 U.S.C. Section 1746, as follows:

1. I am the principal of The Law Office of Joseph Peter Drennan, one of four law firms representing the Plaintiffs in the above-captioned *Marie Laure Anaya, et al. v. Islamic Republic of Iran*, 1:18-cv-12341 (GBD) (SN) (the “*Anaya Action*”). I was admitted *pro hac vice* in the *Anaya Action* on February 5, 2019. I submit this Declaration in support of the motion by Plaintiffs Marie Laure Anaya, individually and as personal representative of the Estate of Calixto Anaya, Jr., Kristina-Marie Anaya, Brandon Michael Anaya, Rebecca Anaya, Elizabeth A. Emery, individually and as personal representative of the Estate of Edgar H. Emery, Jr., and Brian K. Emery (collectively, “Movants”) for an order pursuant to Rule 21 of the Federal Rules of Civil Procedure dismissing them as plaintiffs in the *Anaya Action*.

2. In December 2018, Movants retained my firm and co-counsel P. York McLane to pursue civil claims arising out of the September 11, 2001 terrorist attacks (“9/11 Litigation”), and, on December 29, the *Anaya Action* was filed in this Honorable Court.

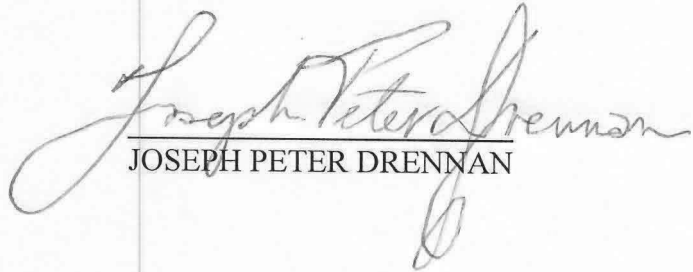
3. In January 2021, my co-counsel James Bonner was contacted by attorney John Eubanks who notified us that his firm, Motley Rice LLC, represents Plaintiffs Marie Laure Anaya, individually and as personal representative of the Estate of Calixto Anaya, Jr., Kristina-Marie Anaya, Brandon Michael Anaya, and Rebecca Anaya in 9/11 Litigation against Iran. I have since confirmed that these individuals are plaintiffs in *Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.*, 1:15-cv-9903 (GBD)(SN), where they assert the same claims against Iran that have been asserted on their behalfs in the *Anaya* Action. I also confirmed that Marie Laure Anaya, Kristina-Marie Anaya, Brandon Michael Anaya, and Rebecca Anaya obtained judgments awarding solatium damages against Iran in September 2019, and that the Estate of Calixto Anaya, Jr. obtained a judgment awarding damages for economic losses and pain and suffering against Iran on February 18, 2020.

4. In the course of my due diligence prior to filing a motion for default judgment against the Islamic Republic of Iran in the *Anaya* Action, I became aware that 9/11-related judgments had been entered against Iran in favor of the Estate of Edgar H. Emery, Jr. and Elizabeth A. Emery in February 2020. I have since confirmed that Elizabeth A. Emery, individually and as personal representative of Edgar H. Emery, Jr., and Bryan K. Emery are plaintiffs in *Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.*, 1:15-cv-9903 (GBD)(SN), where they assert the same claims against Iran that have been asserted on their behalfs in the *Anaya* Action.

5. Accordingly, I respectfully request this Honorable Court to enter an order dismissing Marie Laure Anaya, individually and as personal representative of the Estate of Calixto Anaya, Jr., Kristina-Marie Anaya, Brandon Michael Anaya, Rebecca Anaya,

Elizabeth A. Emery, individually and as personal representative of the Estate of Edgar H. Emery, Jr., and Brian K. Emery as a plaintiff in the *Anaya* Action.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Fredericksburg, Virginia, on June 23, 2021.


JOSEPH PETER DRENNAN